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**2012 Annual Progress Report and
Master Schedule Update
Revision 0**

**Remedial Investigation/Feasibility Study
Peoples Gas Light and Coke Company
Former Manufactured Gas Plant Sites**

Project No: 1982

October 31, 2012

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FIGURES

Figure 1 Master Schedule

ACRONYMS

ARAR	Applicable or Relevant and Appropriate Requirements
BMc	Burns and McDonnell
CSM	Generalized Conceptual Site Model
FS	Feasibility Study
FSP	Field Sampling Plan
HASP	Health and Safety Plan
IEPA	Illinois Environmental Protection Agency
IBS	Integrys Business Support, LLC
MGP	Manufactured Gas Plant
NRT	Natural Resource Technology, Inc.
OU	Operable Unit
PGL	Peoples Gas Light and Coke Company
QAPP	Quality Assurance Project Plan
RAF	Risk Assessment Framework
ROD	Record of Decision
RI	Remedial Investigation
RPM	Remedial Project Manager
SOW	Statement of Work
SSWP	Site-Specific Work Plan
USEPA	U.S. Environmental Protection Agency

1 INTRODUCTION

1.1 Scope

This Annual Progress Report has been prepared in accordance with Task 8, Subtask 8.2 of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between the U.S. Environmental Protection Agency (USEPA) and Peoples Gas Light and Coke Company (PGL), a subsidiary of Integrys Energy Group, effective October 31, 2008 (2008c). Also included in this report is a Master Schedule Update that includes the general schedule for Remedial Investigation/Feasibility Study (RI/FS) activities at each Site. The Annual Progress Report and Master Schedule Update address PGL's former manufactured gas plant (MGP) Sites located in Chicago, Illinois. The sites include: Crawford Station, North Branch Site (consisting of Division Street Station Operable Unit (OU), North Station OU, and Willow Street-Hawthorne Avenue Station OU), North Shore Avenue Station, and South Branch Site (consisting of 22nd Street Station Upland OU, Hough Place Station Upland OU, South Station Upland OU, Throop Street Station OU and South Branch River OU). Integrys Business Support, LLC (IBS) manages the former MGP sites for PGL.

1.2 Overview

This report addresses the following:

Section 2: Multi-Site Document Progress

Section 3: Site Progress

Section 4: Proposed Master Schedule

Section 5: References

2 MULTI-SITE DOCUMENTS

Under the Settlement Agreement and SOW, Multi-Site documents are used to set forth general approaches and concepts to streamline subsequent site-specific work plans and minimize review times. The Multi-Site RI documents are used to maintain a consistent approach to investigate and assess potential risk at each site. The Multi-Site FS Support Documents are used to develop general response actions and technologies appropriate for MGP sites.

This section summarizes the status of the Multi-Site Documents.

2.1 Multi-Site RI Documents

USEPA has approved all Multi-Site RI Documents submitted between May 7, 2007 and September 8, 2008. The Multi-Site RI Documents set forth a consistent approach for Integrys Energy Group's Illinois and Wisconsin-based subsidiary companies under the USEPA's lead. Section 1.2.1 of the SOW discusses the Multi-Site RI Documents which include:

- Multi-Site Quality Assurance Project Plan – Revision 2, September 4, 2007 (QAPP, 2007(c))
- Multi-Site Health and Safety Plan – Revision 2, August 2, 2007 (HASP, 2007(a))
- Generalized Conceptual Site Model – Revision 0, August 5, 2007 (CSM, 2007(b))
- Multi-Site Risk Assessment Framework – Revision 0, September 5, 2007 (RAF, 2007(d))
- Multi-Site Field Sampling Plan – Revision 4, September 8, 2008 (FSP, 2008(b))

A Multi-Site RAF Addendum was submitted to the USEPA on April 20, 2011 (Exponent, 2011(b)) to incorporate the Regional Screening Levels (RSLs) into the hierarchy for human health screening levels and to further develop the approach to assessing potential vapor intrusion issues.

Site-Specific Work Plans (SSWPs) are based on the Multi-Site documents and include modifications, as necessary, to reflect site-specific conditions. For instance, the site-specific CSM discusses the pathways presented in the Generalized CSM and why or why not the pathway is carried through into the baseline risk assessment.

2.2 Multi-Site FS Support Document

USEPA has approved (USEPA, 2010(c)) the Multi-Site FS Support Document dated March 26, 2010 (FS Support Document, 2010(c)). The Multi-Site FS Support Document includes general response actions and preliminary remedial technologies for Integrys Energy Group's Illinois and Wisconsin-based subsidiary companies under the USEPA's lead.

SOW Section 1.2.2 discusses the Multi-Site FS Support Document which includes:

- Preliminary Remedial Technology Screening
- Preliminary List of Possible Applicable or Relevant and Appropriate Requirements (ARARs)
- Preliminary Permitting/Equivalency Requirements

Site-Specific FS evaluations and the Detailed Analysis of Alternatives (FS Report) for each site are based on the Multi-Site FS Support Document.

2.3 Multi-Site Document Status

USEPA approval has not been received to date on the Risk Assessment Framework Addendum, submitted April 20, 2011 (Exponent, 2011(b)). However, correspondence on site-specific documents for the Wisconsin Public Service Corporation's (WPSC) Stevens Point, Marinette, and Manitowoc sites and NSG's North Plant and South Plant, have included discussion of the RAF Addendum.

2.4 Multi-Site Meetings

During this reporting period, multi-site technical meetings were not conducted to discuss specific technical issues. Site specific meetings were held, as discussed in Section 3.

3 SITE PROGRESS

Project start dates and site prioritization for RI/FS activities were established in Exhibit A, Section A, of the Settlement Agreement (2008(c)). Project start dates were established for the North Branch Site – Division Street Station OU, South Branch Site – South Station Upland OU, North Shore Avenue Station Site, and Crawford Station Site. Start dates for the remaining OUs were to be initiated every six months, or as otherwise mutually agreed upon.

The priority of the sites has been modified from the sites identified in the SOW. At this time, the South Station Upland OU (South Branch Site), Division Street Station OU (North Branch Site), Willow Street-Hawthorne Avenue Station OU (in lieu of North Shore Avenue Site), North Station (North Branch Site), Crawford Station Site, and Throop Street Station Upland OU (South Branch Site) have been initiated. The remaining sites have not been initiated. In addition to the RI/FS phase, a Time-Critical Removal Action has been initiated at the Crawford Station Site.

The North Branch Sites – Division Street Station OU, Willow Street-Hawthorne Avenue Station OU, and North Station OU were initiated on November 25, 2008, April 28, 2009, and June 15, 2011, respectively, with submittal of the Completion Reports. The South Branch Sites – South Station Upland OU and Throop Street Station Upland OU were initiated on May 13, 2008 and June 20, 2012, respectively, with submittal of the Completion Reports. The Crawford Station Site RI/FS was initiated on December 23, 2011 with submittal of the Completion Report. The AOC for a Time-Critical Removal Action for Crawford Station Site was signed on October 13, 2011. Progress on the Time-Critical Removal Action is discussed in weekly progress reports submitted to USEPA and is not included in this RI/FS AOC Annual Progress Report.

RI planning activities have been conducted for the Division Street Station OU, Willow Street/Hawthorne Avenue Station OU, North Station OU, Throop Station OU during this reporting period. RI field activities have been performed at the South Station Upland OU, Division Street Station OU, and Willow Street/Hawthorne Avenue Station OU during this reporting period. Pre-design investigation sampling was also performed at South Station Upland OU and Crawford Station during this reporting period. A removal action was contemplated at South Station Upland OU, but not initiated. As discussed above, Time-Critical Removal Actions have been performed at the Crawford Station during this reporting period.

The Annual Progress Report is intended to provide a concise summary of the progress of the work completed at each of the MGP sites. As part of the progress report, the anticipated progress (as presented in the SOW and the Master Schedule Update dated October 28, 2011 (2011(h)) is compared to the actual progress.

3.1 Overview Progress Meetings

A program overview meeting was not held during this time period.

3.2 South Station Upland OU (South Branch Site)

The Project Start Date for the South Station Upland OU was established in Exhibit A, Section A, to coincide with the effective date of the Settlement Agreement (2008(c)). However, Completion Report – Revision 0 was submitted on May 13, 2008 (2008(a)), prior to finalizing the Settlement Agreement. Per the SOW, scoping meetings and conference calls may be used to discuss the content of South Station Upland OU site-specific documents. No scoping meetings or conference calls were conducted for the South Station Upland OU during the reporting period.

On September 13, 2011 (2011f), USEPA modified the Settlement Agreement to modify the site boundaries of the South Station Upland OU. The modification excluded Parcels C and D from the Settlement Agreement because review of existing data indicates the source removal has been complete and no further remedial action is planned or anticipated on these parcels.

3.2.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals, related to the RI/FS AOC, were not prepared for the South Station Upland OU during this reporting period.

The 2011 Annual Progress Report (2011h) anticipated a Supplemental RI Technical Memorandum to be submitted in February 2012, recommending additional vapor intrusion assessments. However, because a removal action was contemplated, which would affect the scope of additional assessments, the Technical Memorandum was not submitted.

Similarly, the RI Report – Revision 0, Alternatives Array Technical Memorandum, and FS Report – Revision 0 were not submitted.

3.2.2 Remedial Investigation Field Activities

RI field activities as described in the SSWP (2009(a)) were initiated in May 2009. Continued RI activities performed at the South Station Upland OU during this progress report period, are summarized in the following table.

Task	Targeted Completion Date	Actual Completion Date
Eighth Groundwater Monitoring Event	December 2011	January 23, 2012
Ninth Groundwater Monitoring Event	April 2012	April 23, 2012
Tenth Groundwater Monitoring Event	July 2012	July 24-25, 2012
Well Abandonment of Groundwater Monitoring Wells MW-09 and MW-10	October 2012	October 22, 2012
Eleventh Groundwater Monitoring Event	October 2012	October 23-26, 2012

3.2.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
October 2011	November 13, 2011
November 2011	December 19, 2011
December 2011	January 16, 2012
January 2012	February 14, 2012
February 2012	March 12, 2012
March 2012	April 16, 2012
April 2012	May 15, 2012
May 2012	June 11, 2012
June 2012	July 13, 2012
July 2012	August 14, 2012
August 2012	September 14, 2012
September 2012	October 15, 2012

3.3 Division Street Station OU (North Branch Site)

The Project Start Date for the Division Street Station OU was established in Exhibit A, Section A, to coincide with the effective date of the Settlement Agreement (2008(c)) but was re-established to November 25, 2008. Per the SOW, scoping meetings and conference calls may be used to discuss the content of Division Street Station OU site-specific documents. The scoping meetings held are summarized in the following table.

Topic	Date
Review Step I Sediment Sampling Results and Proposed Step II Sediment Sampling Meeting	September 27, 2012
Review USEPA's comments on Division upland data submittal to GEOS, received September 4, 2012, and USEPA's comments on Division sediment data submittal to GEOS, received on October 11, 2012	October 17, 2012

3.3.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table.

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Response to USEPA's November 2, 2011 Comments on Preliminary RI Results, discussed October 20, 2011	--	December 19, 2011	January 26, 2012
Response to USEPA's January 26, 2012 Comments on Response to November 2, 2011 Comments on Preliminary RI Results	--	March 12, 2012	--
Submit Site-Specific Work Plan Addendum No. 1 – Revision 0 for Upland Areas	January 10, 2012	March 12, 2012	March 21, 2012
Response to USEPA's March 21, 2012 Comments on Site-Specific Work Plan Addendum No. 1 for Upland Areas	--	May 7, 2012	May 10, 2012
Submit Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum	--	September 19, 2012	October 11, 2012

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Receive USEPA's Comments on Division upland data submittal to GEOS	--	--	September 4, 2012
Receive USEPA's Comments on Division sediment data submittal to GEOS	--	--	October 11, 2012

3.3.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with USEPA-approved SSWP – Revision 1 (2009(c)), and the USEPA-approved SSWP Addendum No. 1 (2012(e)). Completed RI activities are summarized in the following table.

Task	Targeted Completion Date	Actual Completion Date
Third Quarterly Groundwater and Second Soil Gas Sampling Event	November 2011	November 14-21, 2011
Step I Surface Water and Sediment Sampling in Adjacent River Area	Fall/Winter 2011	December 5, 2011 through February 15, 2012
Fourth Quarterly Groundwater Sampling Event	February 2012	February 13, 2012
Implement SSWP Addendum No. 1 – Revision 1 field work ¹	February 2012	September 20, 2012
Step II Sediment Sampling in Adjacent River Area	January 2012	-- ²

1. SSWP Addendum No. 1 implementation assumed the supplemental RI activities were identified in January 2012 and approved in February 2012.
2. Completion of Step II Sediment Sampling assumed Division Street OU Step II Sediment Sampling Scope would be implemented with the North Station OU (SSWP- Rev 1, (2012(f)), approved March 20, 2012) and review of Step I Data Evaluation of North Branch Sediment Sampling Technical Memorandum (2012(aa)).

3.3.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
October 2011	November 13, 2011
November 2011	December 19, 2011
December 2011	January 16, 2012
January 2012	February 14, 2012
February 2012	March 12, 2012
March 2012	April 16, 2012
April 2012	May 15, 2012
May 2012	June 11, 2012
June 2012	July 13, 2012
July 2012	August 14, 2012
August 2012	September 14, 2012
September 2012	October 11, 2012

3.4 Willow Street – Hawthorne Avenue Station OU (North Branch Site)

The Project Start Date for the Willow Street – Hawthorne Avenue Station OU was not established in Exhibit A, Section A, of the Settlement Agreement (2008(c)). The start date was established as April 30, 2009 as summarized in the 2008 to 2009 Annual Progress Report (2009(e)). Per the SOW, scoping meetings and conference calls may be used to discuss the content of Willow Street – Hawthorne Avenue Station OU site-specific documents. The scoping meetings held are summarized in the following table.

Topic	Date
Review Step I Sediment Sampling Results and Proposed Step II Sediment Sampling Meeting	September 27, 2012
Review USEPA's comments on Willow/Hawthorne sediment data submittal to GEOS, received on October 11, 2012	October 17, 2012

3.4.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table.

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit Letter and Update to SSWP-Revision 2 Regarding Sampling Parameters ¹		June 25, 2012	Acknowledged July 10, 2012
Submit Revised Vapor Intrusion Update to SSWP – Revision 2	--	September 5, 2012	September 13, 2012
Submit Response to USEPA's September 13, 2012 Comments on Revised Vapor Intrusion Update to SSWP – Revision 2	--	September 25, 2012	October 25, 2012

1. The Willow Street – Hawthorne Avenue Station OU SSWP – Revision 2 (2011(d)) was conditionally approved on August 30, 2011. Access agreements with third party owners required modifications (sample locations and parameters) to the SSWP.

3.4.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with USEPA-approved SSWP – Revision 2 (2011(d)). Completed RI activities are summarized in the following table.

Task	Targeted Completion Date	Actual Completion Date
Step I Surface Water and Sediment Sampling in Adjacent River Area	Fall/Winter 2011	December 5, 2011 through February 15, 2012
Step II Sediment Sampling in Adjacent River Area	January 2012	-- ¹

1. Completion of Step II Sediment Sampling assumed Willow Street – Hawthorne Avenue Station OU Step II Sediment Sampling Scope would be implemented with the North Station OU (SSWP- Rev 1 (2012(f)), approved March 20, 2012) and review of Step I Data Evaluation of North Branch Sediment Sampling Technical Memorandum (2012(aa)).

3.4.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
October 2011	November 13, 2011
November 2011	December 19, 2011
December 2011	January 16, 2012
January 2012	February 14, 2012
February 2012	March 12, 2012
March 2012	April 16, 2012
April 2012	May 15, 2012
May 2012	June 11, 2012
June 2012	July 13, 2012
July 2012	August 14, 2012
August 2012	September 14, 2012
September 2012	October 11, 2012

3.5 North Station OU (North Branch Site)

The Project Start Date for the North Station OU was not established in Exhibit A, Section A, of the Settlement Agreement (2008(c)). The start date was established as June 15, 2011 as summarized in the 2010 Annual Progress Report and Master Schedule Update (NRT, 2010(n)). Per the SOW, scoping meetings and conference calls may be used to discuss the content of North Station OU site-specific documents. No scoping meetings or conference calls were held during this reporting period.

3.5.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table.

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit SSWP – Revision 1)	November 28, 2011	November 28, 2011	January 26, 2012
Submit Response to USEPA's January 26, 2012 Comments and Modified SSWP – Revision 1	March 12, 2012	March 12, 2012	Approved March 20, 2012
Submit Letter and Update to Modified SSWP- Revision 1 Regarding Sampling Parameters ¹	--	June 25, 2012	Acknowledged July 10, 2012

1. Access agreements with third party owners required modifications (sample locations and parameters) to the Modified SSWP – Revision 1 submittal (2012(p)).

3.5.2 Remedial Investigation Field Activities

RI field investigation activities were targeted to be initiated in March 2012, assuming USEPA approval of the SSWP by mid January 2012. However, USEPA approved the SSWP on March 20, 2012 (2012(h)) and third party access agreements required additional SSWP modifications. Therefore, RI field investigation activities were not completed at the North Station OU during this reporting period.

3.5.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
October 2011	November 13, 2011
November 2011	December 19, 2011
December 2011	January 16, 2012
January 2012	February 14, 2012
February 2012	March 12, 2012
March 2012	April 16, 2012

Monthly Progress Report	Submittal Date
April 2012	May 15, 2012
May 2012	June 11, 2012
June 2012	July 13, 2012
July 2012	August 14, 2012
August 2012	September 14, 2012
September 2012	October 11, 2012

3.6 Crawford Station

As previously discussed, PGL and USEPA entered into a Time-Critical AOC on October 13, 2011 to address portions of the site that had MGP residuals at the surface and were accessible for removal. The Time Critical Removal is proceeding under AOC V-W-11-C-981 and, therefore, is not summarized in detail in this report which address the RI/FS activities.

The Project Start Date for the Crawford Station OU was not established in Exhibit A, Section A, of the RI/FS Settlement Agreement (October 31, 2008). The start date was established as December 16, 2011 as summarized in the 2011 Annual Progress Report and Master Schedule Update (2011(h)). Due to the size and multiple property owners at Crawford Station, the site will be subdivided into more manageable Parcel Groups in the SSWP. Parcel Groups will be mutually identified with USEPA and IBS and may be selected based on access, adjacent parcels, or other criterion. Parcel Groups will range in area. Per the SOW, scoping meetings and conference calls may be used to discuss the content of Crawford Station OU site-specific documents. The scoping meetings held are summarized in the following table.

Topic	Date
Pre-SSWP Scoping Meeting	January 24, 2012
Follow Up SSWP Scoping Meeting	July 5, 2012
SSWP Progress Meeting/Follow Up Discussion	August 30, 2012

3.6.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table.

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit Completion Report – Revision 0	December 16, 2011	December 23, 2011	February 27, 2012
Submit Parcel Group 1 SSWP – Revision 0	March 15, 2012	March 14, 2012	May 22, 2012
Submit Response to USEPA's February 27, 2012 Comments on Completion Report – Revision 0	April 12, 2012	April 3, 2012	--
Submit Response to USEPA's May 22, 2012 Comments on Parcel Group 1 SSWP – Revision 0 and Parcel Group 1 SSWP – Revision 1	August 5, 2012	August 3, 2012	September 4, 2012
Submit Response to Comments to USEPA's September 4, 2012 Comments on Group 1 SSWP Revision 1	October 19, 2012	October 19, 2012	Review Pending

3.6.2 Remedial Investigation Field Activities

Parcel Group 1 RI field investigation activities were targeted to be initiated in October 2012, assuming USEPA approval of the SSWP in July 2012. However, USEPA approval of the Parcel Group 1 SSWP is pending following IBS's submittal of a response to comments letter dated October 19, 2012 (2012(ag)). A schedule for RI/FS field investigation activities will be established following USEPA's final approval of the Parcel Group 1 SSWP Revision 1 (2012(t)).

3.6.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
October 2011	November 9, 2011
November 2011	December 12, 2011
December 2011	January 11, 2012
January 2012	February 10, 2012
February 2012	March 11, 2012
March 2012	April 10, 2012
April 2012	May 10, 2012
May 2012	June 8, 2012
June 2012	July 11, 2012
July 2012	August 10, 2012
August 2012	September 11, 2012
September 2012	October 11, 2012

3.7 Throop Street Station

The Project Start Date for the Throop Street Station OU was not established in Exhibit A, Section A, of the RI/FS Settlement Agreement (2008(c)). The start date was established as June 20, 2012 as summarized in the 2011 Annual Progress Report and Master Schedule Update (2011(h)). Per the SOW, scoping meetings and conference calls may be used to discuss the content of Throop Street Station OU site-specific documents. The scoping meetings held are summarized in the following table.

Topic	Date
Pre-SSWP Scoping Meeting	August 30, 2012

3.7.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table.

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit Completion Report – Revision 0	June 20, 2012	June 20, 2012	August 1, 2012
Receive USEPA Comments on the August 30, 2012 Pre- SSWP Scoping Meeting	--	September 13, 2012	--
Submit Response to USEPA's August 1, 2012 Comments on Completion Report – Revision 0 and SSWP – Revision 0	October 29, 2012	October 15, 2012	--

3.7.2 Remedial Investigation Field Activities

RI field investigation activities were not completed at the Throop Street Station OU during this reporting period.

3.7.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
June 2012	July 16, 2012
July 2012	August 14, 2012
August 2012	September 14, 2012
September 2012	October 11, 2012

3.8 Remaining PGL Sites

Additional project start dates for the remaining sites were not established for this reporting period in the 2011 Annual Progress Report and Master Schedule Update Report (2011(h)). Project start dates for remaining sites are discussed in Section 4.

4 PROPOSED MASTER SCHEDULE

Exhibit A of the SOW includes a schedule for major deliverables. The South Station Upland OU, Division Street Station OU, Willow Street – Hawthorne Avenue Station OU, and North Station OU, Crawford Station, and Throop Station OU have been initiated. RI field work, has been performed at the South Station Upland OU, Division Street OU and ambient sediment in the North Branch Chicago River.

Future submittals and/or activities at South Station Upland OU, Division Street Station OU, Willow Street – Hawthorne Avenue Station OU, Crawford Station, and Throop Station OU are dependent on USEPA comments and approvals. The site-specific schedules for South Station Upland OU, Division Street Station OU, Willow Street – Hawthorne Avenue Station OU, Crawford Station, and Throop Station, presented in the SSWPs or supplemental RI activities, are updated herein to provide proposed site-specific schedules for field activities and major deliverables. A proposed schedule for Hough Place Station OU and North Shore Avenue Station, and Pitney Court Station OU is presented herein for major deliverables. As discussed in Section 3.8, Project Start Dates for remaining PGL sites are to be established.

4.1 Overview Progress Meetings

Overview progress meetings are proposed to be conducted on an as-needed basis at the request of either USEPA or IBS. Specific progress meeting dates are not proposed at this time.

4.2 Multi-Site RI Documents

The Multi-Site Documents, as described in the SOW, have been completed and approved as summarized in Section 2. Additional Multi-Site Documents are not anticipated at this time. Addendums to the multi-site documents may be issued, as appropriate, to update programmatic procedures or approaches.

4.3 Schedule for PGL Sites

Figure 1 summarizes the proposed target dates for RI/FS activities at each of the sites. The proposed target dates are generally consistent with the schedules provided in the SSWPs, adjusted to reflect current status, USEPA approvals and reasonably anticipated approvals. All site schedules are dependent on USEPA approval dates, contractor availability, and sampling seasons (particularly with respect to sediment sampling activities).

Figure 1 considers the deliverable timeframes specified in Exhibit A of the SOW (e.g., SSWPs submitted 90 days following the Completion Report submittal, finalize submittals within 45 days from receipt of USEPA comments, etc.). For planning purposes, it is assumed USEPA will provide comments within 60 days of submittals for Revision 0 and provide approvals within 45 days of receiving Revision 1.

The proposed schedules are subject to change. Modifications to the schedule, if necessary, will be communicated to USEPA through monthly site-specific progress reports, weekly progress conference calls during RI activities, or other communications.

4.3.1 South Station Upland OU (South Branch Site)

The tasks provided in the South Station Upland OU SSWP – Revision 1, dated January 26, 2009 (2009(a)), have been completed up to submittal of the RI Report – Revision 0. As noted in Section 3.2.2, supplemental RI field activities have been initiated in September 2011, primarily to fully delineate the groundwater plume.

Supplemental RI field activities are anticipated to address potential vapor intrusion. These tasks and on-going post RI groundwater monitoring are presented in Figure 1 and summarized in the following table.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Submit Supplemental RI Technical Memorandum – Vapor Intrusion, Revision 0 (assumes groundwater plume is fully defined)	January 18, 2013
Supplemental RI Field Activities (assumes USEPA approval of Supplemental RI Technical Memorandum – Vapor Intrusion, Revision 0 by mid February 2013)	Install Additional Groundwater Monitoring Wells, if needed – March 2013 Install Soil Gas Probes – March 2013 Soil Gas Sampling Event 1 – March 2013 Soil Gas Sampling Event 2 – September 2013
Submit RI Report – Revision 0 to USEPA (assumes no additional RI activities are identified)	December 9, 2013
Alternatives Array Tech Memo to USEPA	February 7, 2014
FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array Tech Memo early April 2014)	May 23, 2014
On-going Post RI Groundwater Monitoring	To be determined following review of RI Data Preliminarily proposed as quarterly

4.3.2 Division Street OU (North Branch Site)

The tasks provided in the Division Street OU SSWP – Revision 1, dated September 21, 2009 (2009(f)) and supplemental RI field activities have been completed in the upland area and Step 1 of the sediment sampling. The need for additional supplemental RI field activities in the upland areas will be evaluated following review of RI data performed in late August 2012 (soil sampling, additional groundwater monitoring wells, and soil vapor probes).

Step II sediment sampling adjacent to the Division Street OU will be investigated as described in the SSWP – Revision 1, dated September 21, 2009 (2009(f)) and the Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum, (2012(ac)), as presented in Figure 1. Major deliverable target dates are summarized in the following table.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Supplemental RI Field Activities - Upland	Supplemental GW Sampling Event 2 – December 2012 Supplemental GW Event 3 and Soil Gas Sampling Event 2 – March 2013
RI Field Activities - Sediment adjacent to Division Street OU (assumed concurrent with Willow Street – Hawthorne Avenue Station OU and North Station OU and permits attained within 90 days of submittal)	– November 2011 Surface Water Sampling – February-March 2013 Step II Sediment Sampling (as discussed in the RAF)
Submit RI Report – Revision 0 to USEPA	June 25, 2013
Alternatives Array Tech Memo to USEPA	August 26, 2013
Submit FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array Tech Memo early October 2013)	December 9, 2013
On-going Post RI Groundwater Monitoring	To be determined following review of RI Data Preliminarily proposed quarterly

4.3.3 Willow Street – Hawthorne Avenue Station OU (North Branch Site)

The Willow Street – Hawthorne Avenue Station OU SSWP – Revision 2 was submitted to USEPA on July 15, 2011 (2011(d)) and conditionally approved on August 30, 2011. The tasks provided in the Willow Street – Hawthorne Avenue Station OU SSWP – Revision 2 (2011(d)) related to Step 1 of the sediment sampling have been completed. The schedule for implementing upland remedial investigations and report submittals (RI and FS) has been updated since site access has been established.

Step II sediment sampling adjacent to the Willow Street – Hawthorne Avenue Station OU will be investigated as described in the SSWP – Revision 2, and the Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum, (2012(ac)), as presented in Figure 1. Major deliverable target dates are summarized in the following table.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
RI Field Activities - Upland	Soil Boring Installation/Soil Vapor Sampling – November – December 2012 Groundwater Monitoring Well Installation/Development – November – December 2012 Quarterly RI groundwater monitoring – December 2012 through October 2012
RI Field Activities - Sediment adjacent to Willow Street-Hawthorne Avenue Station OU (assumed concurrent with Division Street OU and North Station OU and permits attained within 90 days of submittal)	Surface Water Sampling – November 2011 Step II Sediment Sampling (as discussed in the RAF) –March-April 2013
Submit RI Report – Revision 0 to USEPA	January 16, 2014
Alternatives Array Tech Memo to USEPA	March 17, 2014
Submit FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array in May 2014)	June 30, 2014
On-going Post RI Groundwater Monitoring	To be determined following review of RI Data

4.3.4 North Station OU (North Branch Site)

The North Station OU SSWP – Revision 1 was submitted to USEPA on November 28, 2011 (2011(f)) and approved by USEPA on March 20, 2012 (2012(h)). An update to modify the sampling parameters was submitted on June 25, 2012 (2012(p)). Major deliverable target dates are presented on Figure 1 and summarized in the following table.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
RI Field Activities – Upland (assumes access agreements are in place December 2012)	Soil Boring Installation/Sampling – March 2013 Groundwater Monitoring Well Installation – March 2013 Soil Gas Probe Installation – March 2013 Quarterly RI Groundwater Monitoring – April 2013 through January 2014)
RI Field Activities - Sediment adjacent to North Station OU (assumed Step I Sampling is concurrent with Division Street Station and Willow Street – Hawthorne Avenue Station OU Step II Sampling)	Bathymetric Survey – December 2012 Surface Water Sampling – November 2012 Step I Sediment Sampling (as discussed in the RAF) – January-February 2013 Step II Sediment Sampling (as discussed in the RAF) – if necessary, September 2013 (assumes scope is defined August 2013)
Submit RI Report – Revision 0 to USEPA	June 14, 2014
Alternatives Array Tech Memo to USEPA	August 4, 2014
Submit FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array in August 2014)	November 17, 2014
On-going Post RI Groundwater Monitoring	To be determined following review of RI Data

4.3.5 Crawford Station

The project start date for Crawford Station was established as December 15, 2011. A Completion Report (2011(I)) for the entire Crawford Station site has been prepared and submitted to USEPA. Due to the size and multiple property owners at Crawford Station, a phased approach to the RI/FS activities has been proposed and approved by USEPA. Accordingly, the initial SSWP has been prepared to reflect four groups of parcels that will be investigated in a sequential manner during the RI/FS. The Parcel Group 1 SSWP – Revision 1 (2012(ag)) has been submitted and reviewed by USEPA and final approval is currently pending. Site specific work plans addressing each of the other parcel groups (Groups II through IV) will be submitted as addenda to the SSWP.

Proposed target dates for future RI/FS activities, are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month starting in January 2012
RI Field Activities – Upland Parcel Group 1 (assumes USEPA approval of SSWP in November 2012)	Soil Boring Installation/Sampling – March 2013 Groundwater Monitoring Well Installation – April 2013 Soil Gas Probe Installation – April 2013 Quarterly RI Groundwater Monitoring – April 2013 through January 2014)
Submit Parcel Group 1 RI Report – Revision 0 to USEPA	June 3, 2014
Parcel Group 1 Alternatives Array Tech Memo to USEPA	August 4, 2014
Submit Parcel Group 1 FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array in October 2014)	November 17, 2014
Submit Parcel Group 2 SSWP Addendum – Revision 0 to USEPA	March 15, 2013
Initiate Parcel Group 2 RI Field Work	July 2013

4.3.6 Throop Station OU (South Branch Site)

The project start date for the Throop Station OU (South Branch Site) was established as June 20, 2012. A proposed schedule was developed as part of the SSWP – Revision 0, submitted October 15, 2012 (2012(a)). Proposed target dates, after submittal of the SSWP (summarized below), are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Submit SSWP – Revision 0 to USEPA	October 15, 2012
Submit SSWP – Revision 1 to USEPA (assumes USEPA comments on SSWP Revision 0 are received November 2012)	January 2013
Initiate RI Field Work (to be provided in SSWP, USEPA approval assumed in February 2013)	April 2013 – Upland
Submit RI Report – Revision 0 to USEPA (assumes supplemental RI activities are not required)	May 2014

4.3.7 Hough Place Station OU (South Branch Site)

The project start date for the Hough Place Station OU (South Branch Site) is proposed as February 15, 2013. As a result of significant remedial actions performed at the site, the Completion Report is proposed to be expanded to include a Baseline Risk Assessment which will potentially expedite the RI/FS process. This approach will be discussed in a pre-scoping meeting with USEPA and IBS. Proposed target dates, after submittal of the Completion Report/Baseline Risk Assessment (summarized below), are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals and the expedited process identified.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month starting in March 2013
Submit Completion Report/Baseline Risk Assessment – Revision 0 to USEPA (Project Start Date)	February 15, 2013

Task/Deliverable	Target Date for Completion
Submit SSWP – Revision 0 to USEPA	May 17, 2013
Submit SSWP – Revision 1 to USEPA (assumes USEPA comments on SSWP Revision 0 are received early July 2013)	August 2013
Initiate RI Field Work (to be provided in SSWP, USEPA approval assumed in September 2013)	November 2013 – Upland
Submit RI Report – Revision 0 to USEPA (assumes supplemental RI activities are not required)	January 2015

4.3.8 North Shore Avenue Station

The project start date for the North Shore Avenue Station is proposed as July 12, 2013. As a result of significant remedial actions performed at the site, the Completion Report is proposed to be expanded to include a Baseline Risk Assessment which will potentially expedite the RI/FS process. This approach will be discussed in a pre-scoping meeting with USEPA and IBS. Proposed target dates, after submittal of the Completion Report/Baseline Risk Assessment (summarized below), are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals and the expedited process identified.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month starting in August 2013
Submit Completion Report/Baseline Risk Assessment – Revision 0 to USEPA (Project Start Date)	July 12, 2013
Submit SSWP – Revision 0 to USEPA	October 10, 2013
Submit SSWP – Revision 1 to USEPA (assumes USEPA comments on SSWP Revision 0 are received August 2013)	January 2014
Initiate RI Field Work (to be provided in SSWP, USEPA approval assumed in February 2014)	April 2014
Submit RI Report – Revision 0 to USEPA (assumes supplemental RI activities are not required)	June 2015

4.3.9 Pitney Court Station (South Branch Site)

The project start date for the Pitney Court Station (South Branch Site) Station is proposed as January 10, 2014. As a result of significant remedial actions performed at the site, the Completion Report is proposed to be expanded to include a Baseline Risk Assessment which will potentially expedite the RI/FS process. This approach will be discussed in a pre-scoping meeting with USEPA and IBS. Proposed target dates, after submittal of the Completion Report/Baseline Risk Assessment (summarized below), are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals and the expedited process identified.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month starting in February 2014
Submit Completion Report/Baseline Risk Assessment – Revision 0 to USEPA (Project Start Date)	January 10, 2014
Submit SSWP – Revision 0 to USEPA	April 10, 2014
Submit SSWP – Revision 1 to USEPA (assumes USEPA comments on SSWP Revision 0 are received March 2014)	May 2014
Initiate RI Field Work (to be provided in SSWP, USEPA approval assumed in June 2014)	August 2014
Submit RI Report – Revision 0 to USEPA (assumes supplemental RI activities are not required)	October 2015

4.4 Remaining PGL Sites

Proposed Project Start Dates and target dates for the remaining sites (22nd Street Station OU and South Branch River OU) have not been established pending progress of the initiated sites, discussed in Section 4.3. It is anticipated Project Start Dates may be established as part of future Progress Meetings (Section 4.1) or in the 2013 Master Schedule Update. Detailed proposed schedules will be developed as part of the SSWPs.

5 REFERENCES

- 2007(a) August 2, 2007. Revision 2, Multi-Site Health and Safety Plan, for Former Manufactured Gas Plant Sites, prepared for Integrys.
- 2007(b) August 5, 2007. Revision 0, Generalized Conceptual Site Model, for Former Manufactured Gas Plant Sites, prepared for Integrys.
- 2007(c) September 4, 2007. Revision 2, Multi-Site Quality Assurance Project Plan, for Former Manufactured Gas Plant Sites, prepared for Integrys.
- 2007(d) September 5, 2007. Revision 2, Exponent, Multi-Site Risk Assessment Framework, for Former Manufactured Gas Plant Sites.
- 2008(a) May 13, 2008, Burns and McDonnell, Completion Report, South Station Upland Operable Unit, Chicago, Illinois.
- 2008(b) September 8, 2008. Revision 4, Multi-Site Field Sampling Plan, for Former Manufactured Gas Plant Sites.
- 2008(c) October 31, 2008. United States Environmental Protection Agency and Peoples Gas Light and Coke Company, *Settlement Agreement and Administrative Order on Consent for Remedial Investigations and Feasibility Studies at Four Peoples Gas MGP Sites in Chicago, Illinois*. U.S. EPA Region 5, CERCLA Docket No. V-W-08-C-917.
- 2009(a) January 26, 2009. Burns and McDonnell, Site-Specific Work Plan, Revision 1, South Station Upland Operable Unit, Chicago, Illinois.
- 2009(b) July 16, 2009. Revision 0. Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys.
- 2009(c) September 21, 2009. Burns and McDonnell, Site-Specific Work Plan, Revision 0, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois.
- 2009(d) October 6, 2010. United States Environmental Protection Agency. Email Regarding Hold on Scoping Meetings/Delaying Throop Street Station Start Date.
- 2009(e) November 2, 2009. Burns and McDonnell, 2008 to 2009 Annual Progress Report, South Branch Site and North Branch Site, Chicago, Illinois, The Peoples Light, Gas and Coke Company.
- 2009(f) September 21, 2009. Burns and McDonnell, Site-Specific Work Plan, Revision 1, Division Street Station Operable Unit, Chicago, Illinois.
- 2010(a) March 17, 2010. United States Environmental Protection Agency. Comments on Revision 0 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys.

- 2010(b) March 24, 2010. United States Environmental Protection Agency. Email Regarding Revised Schedule Request – South Station Approval.
- 2010(c) March 26, 2010. Revision 1. Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys.
- 2010(d) April 20, 2010. United States Environmental Protection Agency. Approval of Revision 1 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys.
- 2010(e) June 3, 2010. United States Environmental Protection Agency. Comments on Site-Specific Work Plan, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois.
- 2010(f) July 6, 2010. Natural Resource Technology, Inc. Response to USEPA Comments dated June 3, 2010 on Site-Specific Work Plan, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois.
- 2010(g) July 8, 2010. Natural Resource Technology, Inc. Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois.
- 2010(h) August 19, 2010. United States Environmental Protection Agency. Additional Comments on Site-Specific Work Plan, Revision 0, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois.
- 2010(i) July 8, 2010. United States Environmental Protection Agency. Comments on Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois.
- 2010(j) September 20, 2010. Natural Resource Technology, Inc. Response to USEPA Additional Comments dated August 19, 2010 on Site-Specific Work Plan, Revision 0, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois.
- 2010(k) September 27, 2010. Natural Resource Technology, Inc. Supplement to Characterization of Ambient Conditions in the Chicago River Upstream of the North Branch MGP Sites Technical Memorandum (rev. 9/27/10), Chicago, Illinois, Peoples Gas and Light Company CERCLA Docket No. V-W-08-C-917.
- 2010(l) September 30, 2010. United States Environmental Protection Agency. Approval of Supplement to Characterization of Ambient Conditions in the Chicago River Upstream of the North Branch MGP Sites Technical Memorandum (rev. 9/27/10), Chicago, Illinois, Peoples Gas and Light Company CERCLA Docket No. V-W-08-C-917.
- 2010(m) October 7, 2010. Natural Resource Technology, Inc. Response to USEPA's Comments (dated September 7, 2010) Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois.
- 2010 (n) October 28, 2010, Natural Resource Technology, Inc. 2010 Annual Progress Report and Master Schedule Update, Remedial Investigation/Feasibility Study, Peoples Gas Light and Coke Company, Former Manufactured Gas Plant Sites, CERCLA V-W-08-C-917, Revision 0.

- 2010(o) November 9, 2010. United States Environmental Protection Agency. Additional Comments on the Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois.
- 2010(p) December 23, 2010. Natural Resource Technology, Inc. Response to USEPA's Additional Comments (dated November 9, 2010) Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois.
- 2010(q) January 21, 2011. United States Environmental Protection Agency. Additional Comments on the Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois.
- 2010(r) February 21, 2011. Natural Resource Technology, Inc. Response to USEPA's Additional Comments (dated January 21, 2011) Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois.
- 2011(a) April 18, 2011. Natural Resource Technology, Inc. Site-Specific Work Plan, Willow Street/Hawthorne Avenue Station Operable Unit, Revision 1, Chicago, Illinois.
- 2011(b) April 20, 2011. Exponent, Multi-Site Risk Assessment Framework Addendum, Former Manufactured Gas Plant Sites, North Shore Gas Company CERCLA Docket No. V-W-07-C-877, Peoples Gas Light and Coke Co. CERCLA Docket No. V-W-08-C-917, Wisconsin Public Service Corporation CERCLA Docket No. V-W-06-C-847
- 2011(c) June 15, 2011. Natural Resource Technology, Inc. Completion Report, North Station Operable Unit, Revision 0, Chicago, Illinois.
- 2011(d) July 15, 2011. Natural Resource Technology, Inc. Site-Specific Work Plan, Willow Street/Hawthorne Avenue Station Operable Unit, Revision 2, Chicago, Illinois.
- 2011(e) August 31, 2011. Natural Resource Technology, Inc. Site-Specific Work Plan, North Station Operable Unit, Revision 0, Chicago, Illinois.
- 2011 (f) September 13, 2011. United States Environmental Protection Agency and Peoples Gas Light and Coke Company, *Modification of Settlement Agreement and Administrative Order on Consent for Remedial Investigations and Feasibility Studies at Four Peoples Gas MGP Sites in Chicago, Illinois*. U.S. EPA Region 5, CERCLA Docket No. V-W-08-C-917
- 2011 (g) October 13, 2011. United States Environmental Protection Agency and Peoples Gas Light and Coke Company, *Settlement Agreement and Administrative Order on Consent for Removal Action at Crawford Station MGP Sites in Chicago, Illinois*. U.S. EPA Region 5, CERCLA Docket No. V-W-11-C-981.
- 2011 (h) October 28, 2011. Natural Resource Technology, Inc. 2011 Annual Progress Report and Master Schedule Update, Remedial Investigation/Feasibility Study, Peoples Gas Light and Coke Company, Former Manufactured Gas Plant Sites, CERCLA V-W-08-C-917, Revision 0.
- 2011(i) November 2, 2011. United States Environmental Protection Agency Comments on Preliminary RI Results for Division Street Station OU.

- 2011(j) November 28, 2011. Natural Resource Technology, Inc. Site-Specific Work Plan, North Station Operable Unit, Revision 1, Chicago, Illinois.
- 2011 (k) December 19, 2011 Natural Resource Technology, Inc. Response to USEPA's Comments on Preliminary RI Results for Division Street Station OU. Chicago, Illinois.
- 2011 (l) December 23, 2011 Natural Resource Technology, Inc. Completion Report – Revision 0, Crawford Station. Chicago, Illinois.
- 2012(a) January 26, 2012. United States Environmental Protection Agency Additional Comments on Preliminary RI Results for Division Street Station OU.
- 2012(b) January 26, 2012. United States Environmental Protection Agency Comments on Site-Specific Work Plan, North Station Operable Unit, Revision 1, Chicago, Illinois.
- 2012 (c) February 27, 2012 United States Environmental Protection Agency Comments on Completion Report – Revision 0, Crawford Station. Chicago, Illinois.
- 2012 (d) March 12, 2012 Natural Resource Technology, Inc. Response to USEPA's Additional Comments (dated January 26, 2012) on Preliminary RI Results for Division Street Station OU. Chicago, Illinois.
- 2012 (e) March 12, 2012 Natural Resource Technology, Inc. Site-Specific Work Plan Addendum No. 1 – Revision 0 for Upland Areas, Division Street Station OU. Chicago, Illinois.
- 2012(f) March 12, 2012. Natural Resource Technology, Inc. Response to USEPA Comments on Site-Specific Work Plan, North Station Operable Unit, Revision 1, Chicago, Illinois.
- 2012 (g) March 14, 2012 Natural Resource Technology, Inc. Parcel Group 1 Site-Specific Work Plan - Revision 0, Crawford Station. Chicago, Illinois.
- 2012(h) March 20, 2012. United States Environmental Protection Agency Approval of Site-Specific Work Plan, North Station Operable Unit, Revision 1, Chicago, Illinois.
- 2012 (i) March 21, 2012 United States Environmental Protection Agency Comments on Site-Specific Work Plan Addendum No. 1 – Revision 0 for Upland Areas, Division Street Station OU. Chicago, Illinois.
- 2012 (j) April 3, 2012 Natural Resource Technology, Inc. Response to USEPA Comments on Parcel Group 1 Completion Report - Revision 0, Crawford Station. Chicago, Illinois.
- 2012 (k) May 7, 2012 Natural Resource Technology, Inc. Response to USEPA Comments on Site-Specific Work Plan Addendum No. 1 – Revision 0 for Upland Areas, Division Street Station OU. Chicago, Illinois.
- 2012 (l) May 10, 2012 United States Environmental Protection Agency Additional Comments on Site-Specific Work Plan Addendum No. 1 – Revision 0 for Upland Areas, Division Street Station OU. Chicago, Illinois.

- 2012 (m) May 22, 2012 United States Environmental Protection Agency Comments on Parcel Group 1 Site-Specific Work Plan - Revision 0, Crawford Station. Chicago, Illinois.
- 2012 (n) June 20, 2012 Natural Resource Technology, Inc. Completion Report – Revision 0, Throop Street Station Upland OU. Chicago, Illinois.
- 2012 (o) June 25, 2012 Natural Resource Technology, Inc. Letter and Update to Site-Specific Work Plan – Revision 2 Regarding Sampling Parameters, Willow Street-Hawthorne Avenue Station OU. Chicago, Illinois.
- 2012 (p) June 25, 2012 Natural Resource Technology, Inc. Letter and Update to Site-Specific Work Plan – Revision 1 Regarding Sampling Parameters, North Station OU. Chicago, Illinois.
- 2012 (q) July 10, 2012 United States Environmental Protection Agency Acknowledgement of Letter and Update to Site-Specific Work Plan – Revision 2 Regarding Sampling Parameters, Willow Street-Hawthorne Avenue Station OU. Chicago, Illinois.
- 2012 (r) July 10, 2012 United States Environmental Protection Agency Acknowledgement of Letter and Update to Site-Specific Work Plan – Revision 2 Regarding Sampling Parameters, North Station OU. Chicago, Illinois.
- 2012 (s) August 1, 2012 United States Environmental Protection Agency Comments on Completion Report – Revision 0, Throop Street Station Upland OU. Chicago, Illinois.
- 2012 (t) August 3, 2012 Natural Resource Technology, Inc. Response to USEPA Comments on Parcel Group 1 Site-Specific Work Plan - Revision 1, Crawford Station. Chicago, Illinois.
- 2012 (u) August 3, 2012 Natural Resource Technology, Inc. Parcel Group 1 Site-Specific Work Plan - Revision 1, Crawford Station. Chicago, Illinois.
- 2012 (v) September 4, 2012 United States Environmental Protection Agency Comments on Division Upland Data Submittal to GEOS, Division Street Station OU. Chicago, Illinois.
- 2012 (w) September 4, 2012 United States Environmental Protection Agency Comments on Response to USEPA Comments of Parcel Group 1 Site-Specific Work Plan - Revision 0 and Site-Specific Work Plan – Revision 1, Crawford Station. Chicago, Illinois.
- 2012 (x) September 5, 2012 Natural Resource Technology, Inc. Revised Vapor Intrusion Update to Site - Specific Work Plan – Revision 2, Willow Street-Hawthorne Avenue Station OU. Chicago, Illinois.
- 2012 (y) September 13, 2012 United States Environmental Protection Agency Comments on Revised Vapor Intrusion Update to Site -Specific Work Plan – Revision 2, Willow Street-Hawthorne Avenue Station OU. Chicago, Illinois.
- 2012 (z) September 13, 2012 United States Environmental Protection Agency Comments on August 30, 2012 Pre-Site Specific Work Pan Scoping Meeting, Throop Street Station Upland OU. Chicago, Illinois.

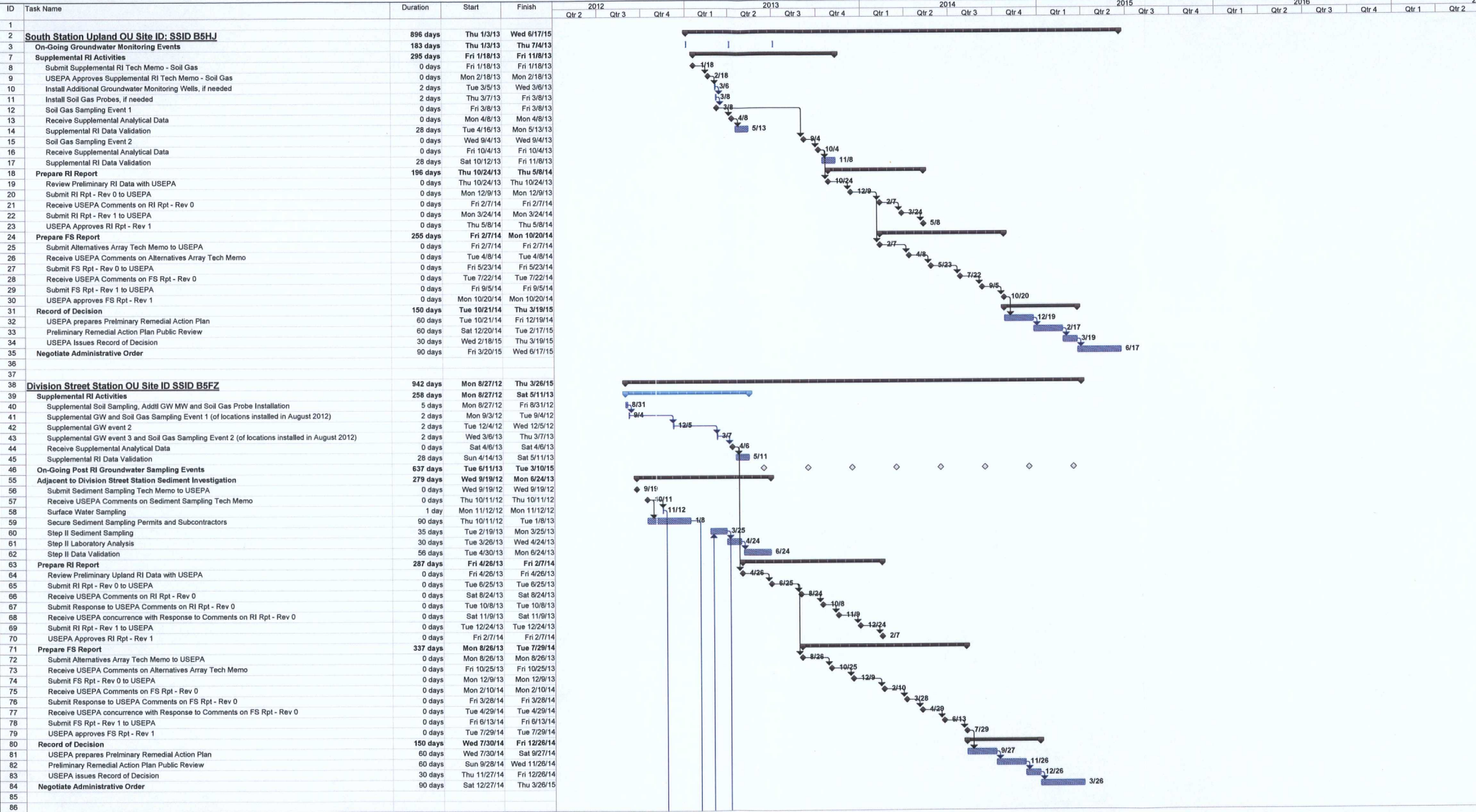
- 2012 (aa) September 19, 2012 Natural Resource Technology, Inc. Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum, North Branch Sediment (Division Street Station OU, Willow Street-Hawthorne Avenue Station OU, and North Station OU). Chicago, Illinois.
- 2012 (ab) September 25, 2012 Natural Resource Technology, Inc. Response to USEPA Comments on Revised Vapor Intrusion Update to Site -Specific Work Plan – Revision 2, Willow Street-Hawthorne Avenue Station OU. Chicago, Illinois.
- 2012 (ac) October 11, 2012 United States Environmental Protection Agency Comments on Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum, North Branch Sediment (Division Street Station OU, Willow Street-Hawthorne Avenue Station OU, and North Station OU). Chicago, Illinois.
- 2012 (ad) October 11, 2012 United States Environmental Protection Agency Comments on Division Sediment Data Submittal to GEOS, Division Street Station OU. Chicago, Illinois.
- 2012 (ae) October 15, 2012 Natural Resource Technology, Inc. Response to USEPA Comments on August 30, 2012 Pre-Site Specific Work Plan Scoping Meeting, Throop Street Station Upland OU. Chicago, Illinois.
- 2012 (af) October 15, 2012 Natural Resource Technology, Inc. Site Specific Work Plan – Revision 0, Throop Street Station Upland OU. Chicago, Illinois.
- 2012 (ag) October 19, 2012 Natural Resource Technology, Inc. Response to USEPA's Comments on Parcel Group 1 Site-Specific Work Plan - Revision 1, Crawford Station. Chicago, Illinois.
- 2012 (ah) October 25, 2012 United States Environmental Protection Agency Comments on Response to USEPA Comments on Revised Vapor Intrusion Update to Site -Specific Work Plan – Revision 2, Willow Street-Hawthorne Avenue Station OU. Chicago, Illinois.

FIGURES





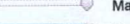















FIGURE 1
2012 Master Schedule Update - Revision 0
Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites

Date: October 31, 2012

CERCLA Docket No. V-W-08-C-917



Project:1982 IBS SAS 2012 PGL MGP schedule
Date: 10/31/12

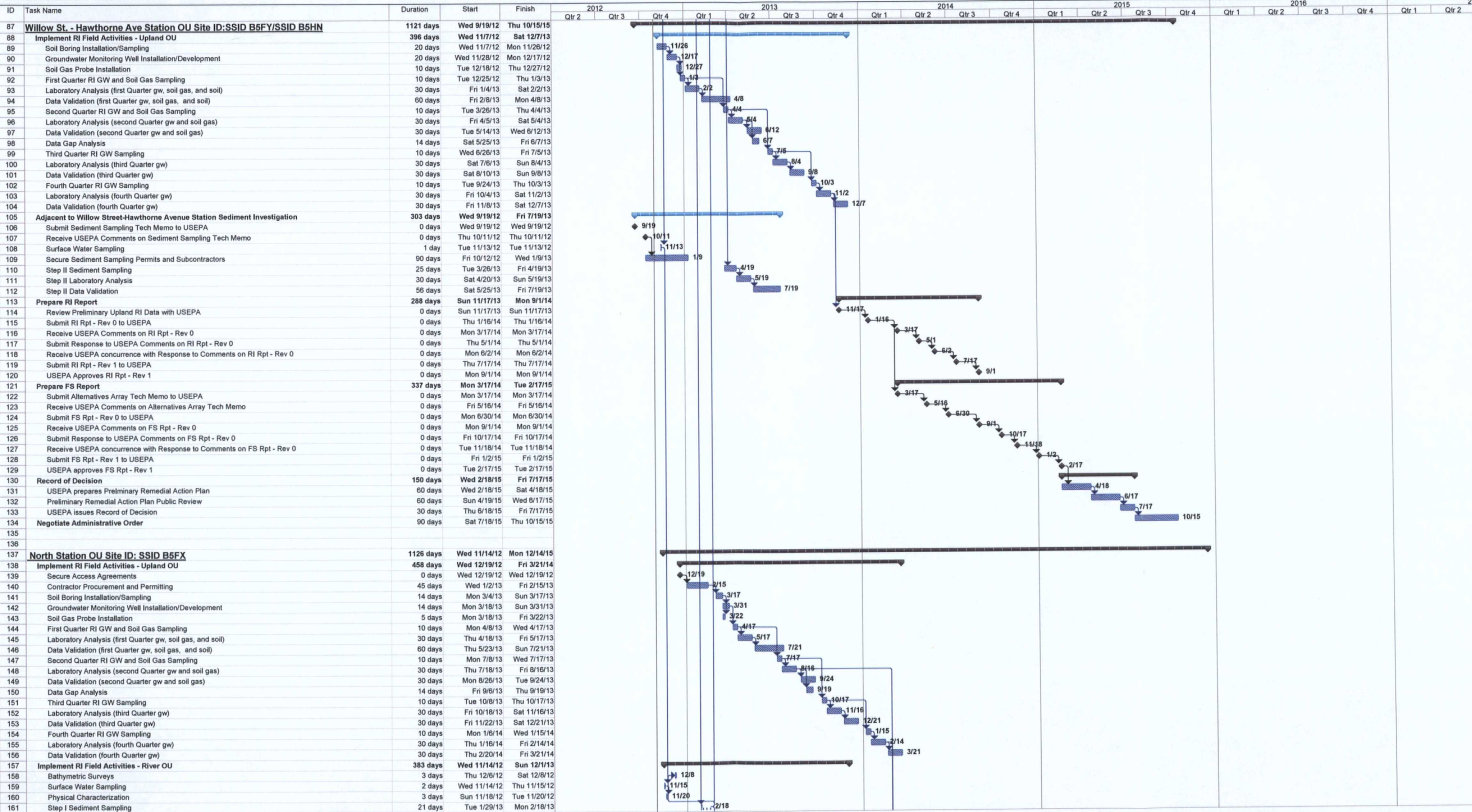
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Milestone		Rolled Up Milestone		External Tasks		Inactive Task		Manual Task		Manual Summary		Progress	
Summary		Rolled Up Progress		Project Summary		Inactive Milestone		Duration-only		Start-only			

1. This preliminary schedule is dependent on USEPA-approval and weather conditions to completed field investigations. Schedule modifications will be in accordance with the AOC/SOW.

FIGURE 1
2012 Master Schedule Update - Revision 0
Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites

Date: October 31, 2012

CERCLA Docket No. V-W-08-C-917



Project:1962 IBS SAS 2012 PGL MGP schedule
Date: 10/31/12

Task

Milestone

Summary

Roll Up Task

Roll Up Milestone

Roll Up Progress

Split

External Tasks

Project Summary

Group By Summary

Inactive Task

Inactive Milestone

Inactive Summary

Manual Task

Duration-only

Manual Summary Rollup

Manual Summary

Start-only

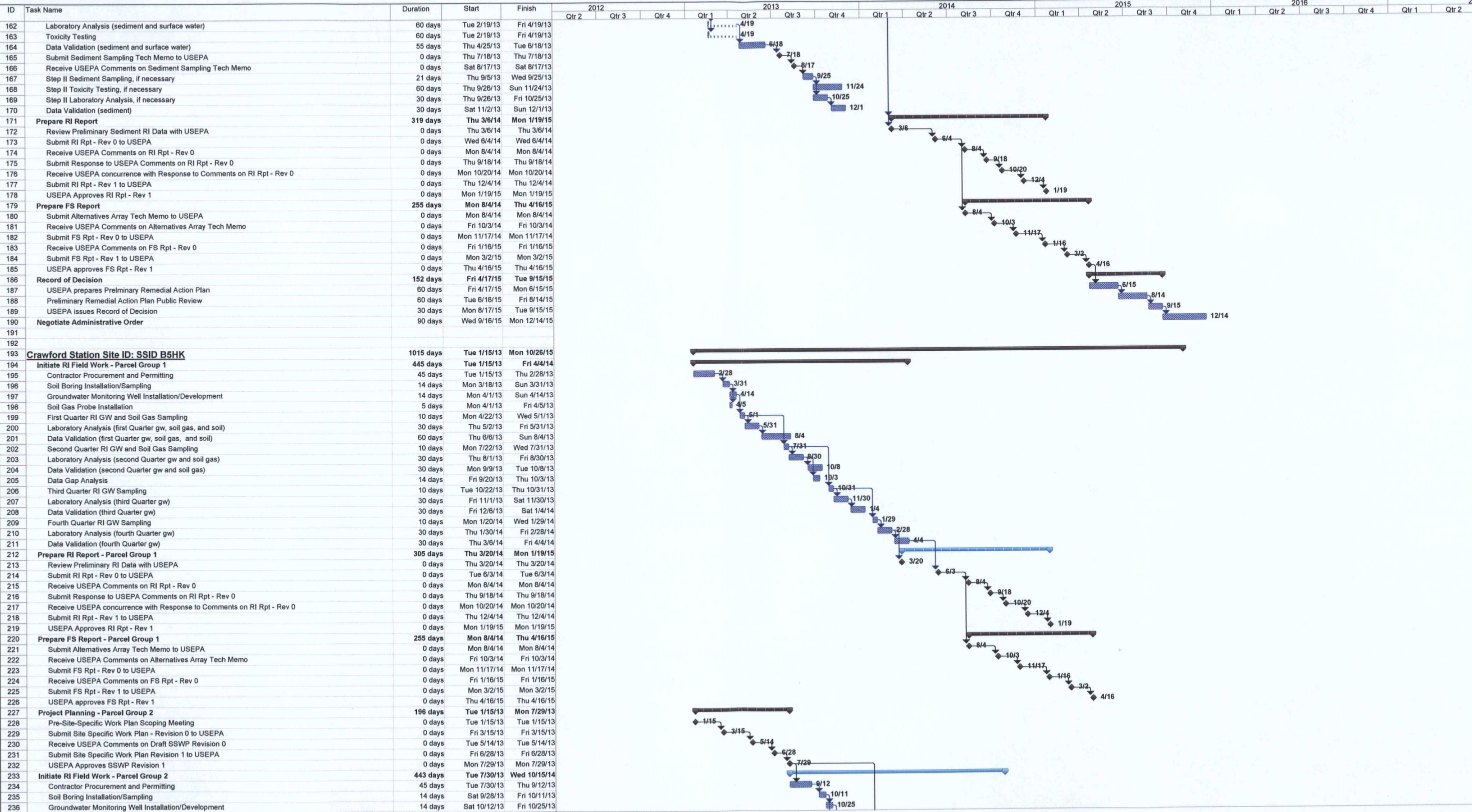
Finish-only

Progress

1. This preliminary schedule is dependent on USEPA-approval and weather conditions to completed field investigations. Schedule modifications will be in accordance with the AOC/SOW.

FIGURE 1
2012 Master Schedule Update - Revision 0
Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites

CERCLA Docket No. V-W-08-C-917



Project: 1982 IBS SAS 2012 PGL MGP schedule
Date: 10/31/12

Task

Milestone

Summary

Roll Up Task

Roll Up Milestone

Roll Up Progress

Split

External Tasks

Project Summary

Group By Summary

Inactive Task

Inactive Milestone

Inactive Summary

Manual Task

Duration-only

Manual Summary Rollup

Manual Summary

Start-only

Finish-only

Progress

1. This preliminary schedule is dependent on USEPA-approval and weather conditions to completed field investigations. Schedule modifications will be in accordance with the AOC/SOW.

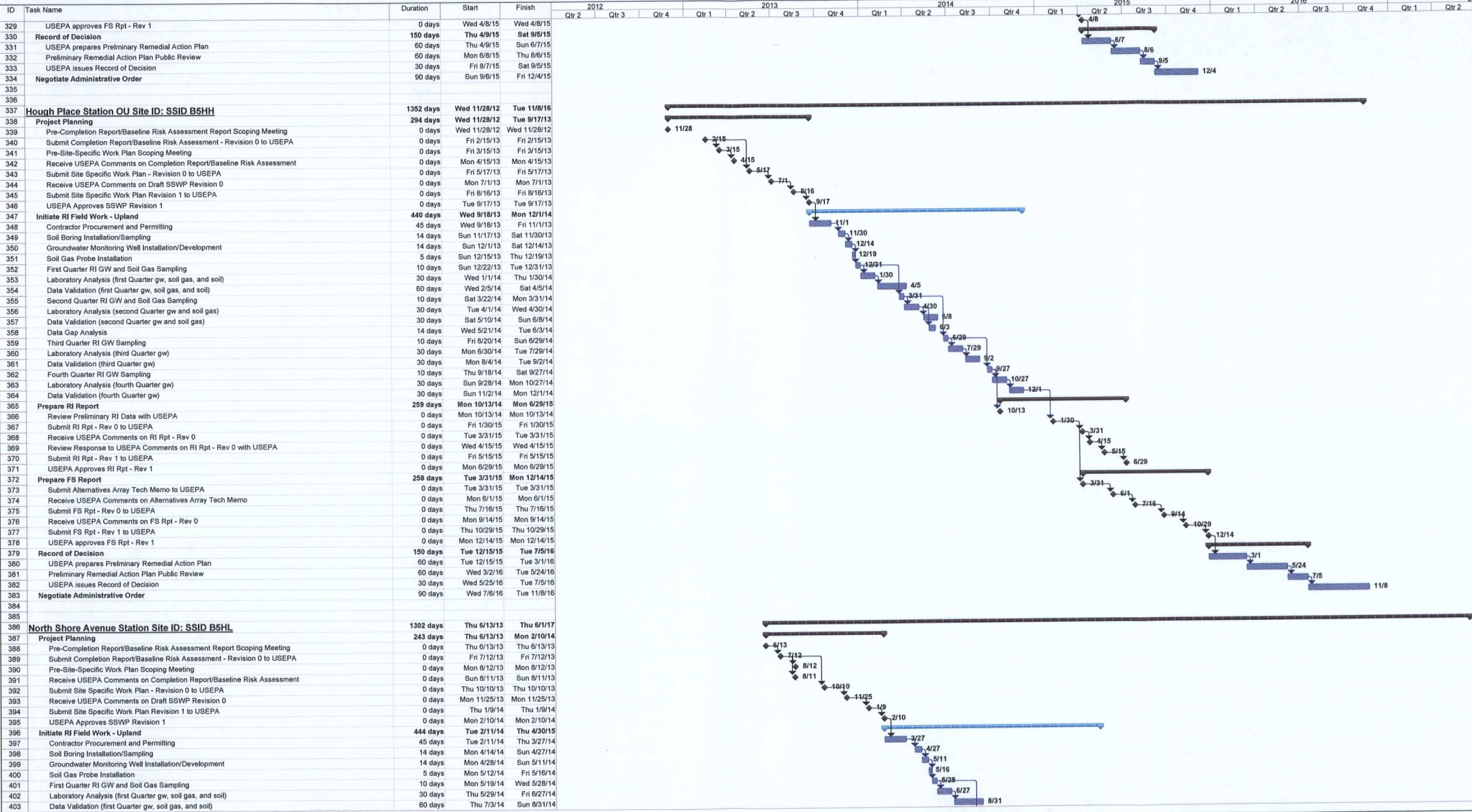
ID		Task Name	Duration	Start	Finish	2012		2013		2014		2015		2016		2017		
						Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2
237		Soil Gas Probe Installation	5 days	Sat 10/12/13	Wed 10/16/13													
238		First Quarter RI GW and Soil Gas Sampling	10 days	Sat 11/2/13	Mon 11/11/13													
239		Laboratory Analysis (first Quarter gw, soil gas, and soil)	30 days	Tue 11/12/13	Wed 12/11/13													
240		Data Validation (first Quarter gw, soil gas, and soil)	60 days	Tue 12/17/13	Fri 2/14/14													
241		Second Quarter RI GW and Soil Gas Sampling	10 days	Sat 2/1/14	Mon 2/10/14													
242		Laboratory Analysis (second Quarter gw and soil gas)	30 days	Tue 2/11/14	Wed 3/12/14													
243		Data Validation (second Quarter gw and soil gas)	30 days	Sat 3/22/14	Sun 4/20/14													
244		Data Gap Analysis	14 days	Wed 4/2/14	Tue 4/15/14													
245		Third Quarter RI GW Sampling	10 days	Sun 5/4/14	Tue 5/13/14													
246		Laboratory Analysis (third Quarter gw)	30 days	Wed 5/14/14	Thu 6/12/14													
247		Data Validation (third Quarter gw)	30 days	Wed 6/18/14	Thu 7/17/14													
248		Fourth Quarter RI GW Sampling	10 days	Sat 8/2/14	Mon 8/11/14													
249		Laboratory Analysis (fourth Quarter gw)	30 days	Tue 8/12/14	Wed 9/10/14													
250		Data Validation (fourth Quarter gw)	30 days	Tue 9/16/14	Wed 10/15/14													
251		Prepare RI Report - Parcel Group 2	486 days	Tue 4/1/14	Fri 7/31/15													
252		Review Preliminary RI Data with USEPA	0 days	Tue 4/1/14	Tue 4/1/14													
253		Submit RI Rpt - Rev 0 to USEPA	0 days	Mon 12/15/14	Mon 12/15/14													
254		Receive USEPA Comments on RI Rpt - Rev 0	0 days	Fri 2/13/15	Fri 2/13/15													
255		Submit Response to USEPA Comments on RI Rpt - Rev 0	0 days	Mon 3/30/15	Mon 3/30/15													
256		Receive USEPA concurrence with Response to Comments on RI Rpt - Rev 0	0 days	Fri 5/1/15	Fri 5/1/15													
257		Submit RI Rpt - Rev 1 to USEPA	0 days	Mon 6/15/15	Mon 6/15/15													
258		USEPA Approves RI Rpt - Rev 1	0 days	Fri 7/31/15	Fri 7/31/15													
259		Prepare FS Report - Parcel Group 2	255 days	Fri 2/13/15	Mon 10/26/15													
260		Submit Alternatives Array Tech Memo to USEPA	0 days	Fri 2/13/15	Fri 2/13/15													
261		Receive USEPA Comments on Alternatives Array Tech Memo	0 days	Tue 4/14/15	Tue 4/14/15													
262		Submit FS Rpt - Rev 0 to USEPA	0 days	Fri 5/29/15	Fri 5/29/15													
263		Receive USEPA Comments on FS Rpt - Rev 0	0 days	Tue 7/28/15	Tue 7/28/15													
264		Submit FS Rpt - Rev 1 to USEPA	0 days	Fri 9/11/15	Fri 9/11/15													
265		USEPA approves FS Rpt - Rev 1	0 days	Mon 10/26/15	Mon 10/26/15													
266		Project Planning - Parcel Group 3	226 days	Mon 10/28/13	Tue 6/10/14													
267		Pre-Site-Specific Work Plan Scoping Meeting	0 days	Mon 10/28/13	Mon 10/28/13													
268		Submit Site Specific Work Plan - Revision 0 to USEPA	0 days	Sat 1/25/14	Sat 1/25/14													
269		Receive USEPA Comments on Draft SSWP Revision 0	0 days	Wed 3/26/14	Wed 3/26/14													

Task		Rolled Up Task		Split		Group By Summary		Inactive Summary		Manual Summary Rollup		Finish-only
Milestone		Rolled Up Milestone		External Tasks		Inactive Task		Manual Task		Manual Summary		Progress
Summary		Rolled Up Progress		Project Summary		Inactive Milestone		Duration-only		Start-only		

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FIGURE 1
2012 Master Schedule Update - Revision 0
Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites

CERCLA Docket No. V-W-08-C-917



Project:1982 IBS SAS 2012 PGL MGP schedule
Date: 10/31/12

Task

Milestone

Summary

Roll Up Task

Roll Up Milestone

Roll Up Progress

Split

External Tasks

Project Summary

Group By Summary

Inactive Task

Inactive Milestone

Inactive Summary

Manual Task

Duration-only

Manual Summary Rollup

Manual Summary

Start-only

Finish-only

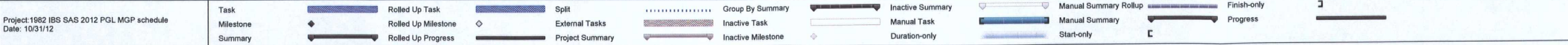
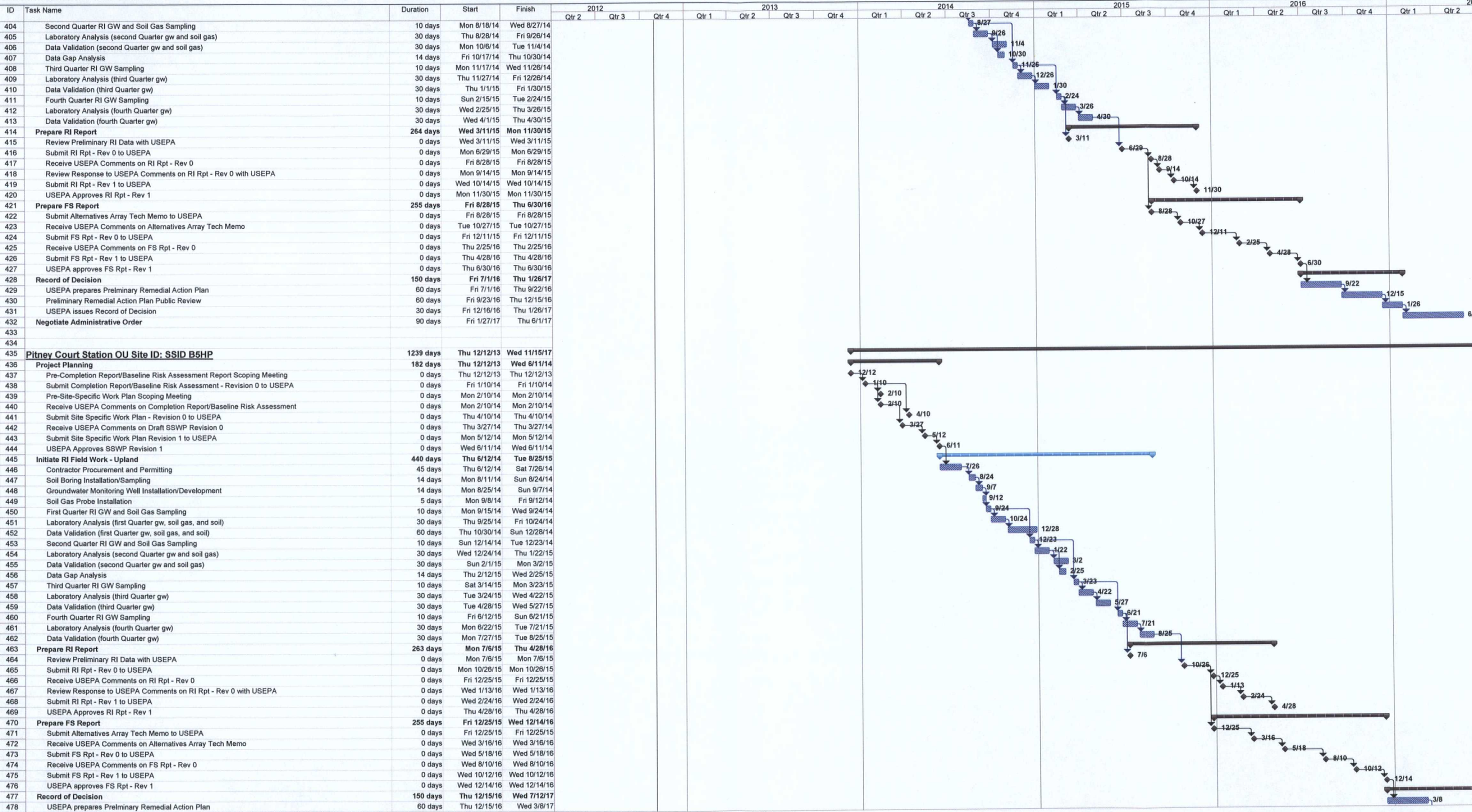
Progress

1. This preliminary schedule is dependent on USEPA-approval and weather conditions to completed field investigations. Schedule modifications will be in accordance with the AOC/SOW.

FIGURE 1
2012 Master Schedule Update - Revision 0
Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites

Date: October 31, 2012

CERCLA Docket No. V-W-08-C-917



1. This preliminary schedule is dependent on USEPA-approval and weather conditions to completed field investigations. Schedule modifications will be in accordance with the AOC/SOW.

FIGURE 1
2012 Master Schedule Update - Revision 0
Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites

CERCLA Docket No. V-W-08-C-917

ID	Task Name	Duration	Start	Finish	2012				2013				2014				2015				2016				20
					Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2
479	Preliminary Remedial Action Plan Public Review	60 days	Thu 3/9/17	Wed 5/31/17																					
480	USEPA issues Record of Decision	30 days	Thu 6/1/17	Wed 7/12/17																					
481	Negotiate Administrative Order	90 days	Thu 7/13/17	Wed 11/15/17																					
482																									
483																									
484	22nd Street Station OU Site ID: B5FW	TBD	TBD	TBD																					
485	Project Start Date to be Established in October 2013 Master Schedule Update	0 days	Thu 10/31/13	Thu 10/31/13																					
486																									
487	South Branch River OU	TBD	TBD	TBD																					
488	Project Start Date to be Established in October 2013 Master Schedule Update	0 days	Thu 10/31/13	Thu 10/31/13																					

Project:1982 IBS SAS 2012 PGL MGP schedule
Date: 10/31/12

Task

Milestone

Summary

Rolled Up Task

Rolled Up Milestone

Rolled Up Progress

Split

External Tasks

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Manual Task

Duration-only

Manual Summary Rollup

Manual Summary

Start-only

Finish-only

Progress

1. This preliminary schedule is dependent on USEPA-approval and weather conditions to completed field investigations. Schedule modifications will be in accordance with the AOC/SOW.